

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LAKAIYA HARRIS,

Plaintiff,

Case No. 18-cv-12751

Hon. Matthew F. Leitman

v.

PERFECTING CHURCH, et al.,

Defendants.

**STIPULATION TO EXTEND ALL DATES
REMAINING IN THE SCHEDULING ORDER BY 90 DAYS**

Plaintiff LAKAIYA HARRIS (“Plaintiff”) and Defendants PERFECTING CHURCH d/b/a Perfecting Church Corporation and MARVIN L. WINANS (“Defendants”), by and through their respective counsel, hereby jointly move for an extension of all remaining dates in the Scheduling Order by 90 days.

The factual bases for this request are as follows:

1. This is a civil action seeking relief under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 et seq., the Michigan Workforce Opportunity Act (“WOWA”), Mich. Comp. Laws § 408.411 et seq., and the Michigan Elliott Larsen Civil Rights Act (“ELCRA”), Mich. Comp. Laws § 37.2101 et seq.
2. This action was commenced on September 5, 2018 (ECF No. 1).
3. Defendants answered the complaint on October 26, 2018 (ECF No. 2).

4. On January 4, 2019 the Court issued a Case Management Requirements and Scheduling Order which, inter alia, set June 7, 2019 as the date for completion of fact discovery.

5. On April 23, 2019, Plaintiff filed a Joint Motion to Extend Fact Discovery (ECF 13). The motion contained detailed information regarding the basis for the request.

6. On April 29, 2019, the Court issued a Stipulated Order Extending the Date for Completion of Fact Discovery from June 7, 2019 to August 9, 2019.

7. From May to August 2019, the parties engaged in extensive written discovery.

8. On September 3, 2019, this Court entered a stipulated order to extend the discovery completion date to October 9, 2019 and extend the dispositive motion deadline to November 9, 2019, to allow the parties to resolve a number of discovery issues and schedule the appropriate depositions in this case.

9. On October 9, 2019 the Court entered a stipulated order to extend the discovery completion date, and all remaining dates in the Scheduling Order, by 90 days.

10. Due to medical conditions prohibiting travel by Plaintiff's attorney, as well as the thanksgiving and winter holidays, the parties have been unable to schedule and conduct the depositions of Plaintiff and three defense witnesses.

11. The depositions of the Plaintiff and the Defendants are set to occur in February.

12. For the foregoing reasons, the Parties request that the Court enter an Order extending all remaining dates in the Scheduling Order by 60 days.

/s/Steven John Moser

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ORDER EXTENDING SCHEDULING ORDER DATES

Pursuant to the stipulation by parties with good cause shown,

IT IS HEREBY ORDERED AND ADJUDGED, that the dates in the Scheduling Order shall be extended by 60 days, as follows:

Discovery Cutoff: March 7, 2020

Dispositive Motions Filed By: April 7, 2020

Motions in *Limine* Filed By: June 1, 2020

Final Pretrial Order By: August 19, 2020

Final Pretrial Conference: September 2, 2020 at 1:30 p.m.

Trial Date: September 22, 2020 at 9:00 a.m.

IT IS FURTHER ORDERED that no further extensions will be granted for any reason.

IT IS SO ORDERED.

/s/Matthew F. Leitman

MATTHEW F. LEITMAN

UNITED STATES DISTRICT JUDGE

Dated: January 10, 2020